## LAW OFFICES GOLDBERG, GODLES, WIENER & WRIGHT

1229 NINETEENTH STREET, N.W. WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG JOSEPH A. GODLES JONATHAN L. WIENER LAURA A. STEFANI DEVENDRA ("DAVE") KUMAR (202) 429-4900 TELECOPIER: (202) 429-4912 e-mail: general@g2w2.com website: www.g2w2.com

HENRIETTA WRIGHT THOMAS G. GHERARDI, P.C. COUNSEL

September 23, 2005

## **Electronic Submission**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: WC Docket Nos. 04-36, 05-196

Ex Parte

Dear Ms. Dortch:

On September 23, 2005, Michael Jackson, Director of Operations, and Christopher Libertelli, Director of Government and Regulatory Affairs of Skype Communications, S.A. ("Skype"), and the undersigned met with Thomas Navin, Bureau Chief, Julie Veach, Acting Deputy Bureau Chief, and Jeremy Marcus, Legal Counsel, all of the Wireline Competition Bureau, to discuss issues raised by Skype in its written filings in the above-captioned proceedings.

Specifically, we discussed the requirement that E911 service be provided by "interconnected" VoIP providers, as defined by the Commission in its *Order* released on June 3, 2005. We reiterated that the Commission should protect consumer expectations by requiring E911 service of VoIP services that act as replacements for traditional telephone service and not of Internet voice services that do not offer two-way interconnection with the PSTN and thereby do not generate consumer expectations for emergency services. The Commission's tentative conclusion in its June *NPRM* that E911 requirements should be applied to separate one-way offerings that *could* be combined by a user to enable both calls to and from the PSTN threatens to create consumer confusion without providing significant public safety benefits.

Please do not hesitate to address any questions to the undersigned.

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Respectfully submitted,

Henry Goldberg

Attorney for Skype Communications, S.A.

cc: Thomas Navin Julie Veach Jeremy Marcus